

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

DUSTIN ISENHART, Individually and on behalf
of all others similarly situated,

Plaintiff,

v.

NRT TECHNOLOGY CORP., *et al*,

Defendants.

Case No. 16-193

Judge: Staci M. Yandle

UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

Defendant, NRT TECHNOLOGY CORP. (“NRT”), by and through its attorneys, and under Fed. R. Civ. P. 6(b), requests a thirty (30) day enlargement of time to answer or otherwise plead, and in support thereof, states as follows:

1. Plaintiff filed a Complaint against NRT on February 23, 2016.
2. Plaintiff filed an Amended Complaint on or about March 7, 2016.
3. NRT was served with the original complaint on March 7, 2016. The docket reflects that NRT’s responsive pleading is due on March 28, 2016.
4. NRT requires more time to provide a meaningful response to the allegations set forth in the Amended Complaint, and therefore seeks leave to file a responsive pleading and requests additional time, up to and including April 27, 2016, in which to answer or otherwise plead.
5. Counsel for NRT spoke with plaintiff’s counsel about the need for additional time. Plaintiff’s counsel advised he had no objection to this Motion.
6. This request is not intended to cause undue delay or annoyance, and no party will be prejudiced if the Motion is granted.

WHEREFORE, Defendant NRT TECHNOLOGY CORP., respectfully requests that this Court grant it leave to file a responsive pleading and extend time up to and including April 27, 2016, to answer or otherwise plead, and to grant such further relief as the Court deems just and proper.

Dated: March 25, 2016

Respectfully submitted,

NRT TECHNOLOGY CORP.

s/ Melanie J. Chico

By: Rosa M. Tumialán, *pro hac* pending
(rtumialan@dykema.com)
Melanie J. Chico
(mchico@dykema.com)
DYKEMA GOSSETT PLLC
10 S. Wacker Drive, Suite 2300
Chicago, Illinois 60606
Ph: (312) 876-1700
Fax: (312) 876-1155

CERTIFICATE OF SERVICE

I hereby certify that, on March 25, 2016, I electronically filed the foregoing ***Unopposed Motion for Enlargement of Time*** with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following counsel of record:

Eric D. Holland
R. Seth Crompton
Holland Law Firm
300 N. Tucker
Suite 801
St. Louis, MO 63101
Attorneys for Plaintiff

Thomas R. Applewhite
Donner Applewhite
1108 Olive Street
Suite 200
St. Louis, MO 63101
Attorneys for Plaintiff

s/Melanie J. Chico _____